

**IN THE UNITED STATES PATENT & TRADEMARK OFFICE**

In re Application of: Timothy G. Offerle, et.al

Serial Number: 10/708,671 Group Art Unit: 3663

Filing Date: March 18, 2004 Examiner: Tuan C. To

Title: Method And Apparatus For Controlling Brake-Steer In An Automotive Vehicle In Reverse

Attorney Docket Number: 81095823

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**APPELLANTS' REPLY BRIEF**

Reduced to its essence, the Examiner's argument appears to impermissibly equate steering angle sensing, as disclosed in Suzuki, with brake steering. Because Suzuki (US 4,609,064) uses steering angle sensing as a trigger for transfer case switching from 4WD to 2WD, the Examiner concludes that it would be obvious to use Suzuki's angle sensing in Takagi's (US 6,324,458) brake-steer system to change from 4WD to 2WD.

The problem with the Examiner's argument is that brake steer doesn't involve "steering" of wheels by turning them about a kingpin (steering) axis; rather, as everyone skilled in the art knows, "brake steering" means preferentially applying brakes to achieve a steering action independent from the rotation of a wheel about its kingpin axis. Hence, brake steer is often used on non-steerable wheels. Because the Examiner has not adequately explained how one skilled in the art would be led to combine Suzuki and Takagi, Appellants hereby renew their request that the Examiner's rejection be reversed.

**CONCLUSION**

If the USPTO determines that a fee is due, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 06-1510.

Respectfully submitted,

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